ZIMMERMAN REED

February 1, 2024

Via ECF

Hon. Kenneth M. Karas United States District Court Southern District of New York United States Courthouse 300 Quarropas Street, Chambers 533 White Plains, NY 10601-4150

Re: Joint Letter Motion to Consolidate Actions

Shapiro, et al. v. Peacock TV LLC, Case No. 7:23-cv-06345-KMK ("Shapiro action") Weiss, et al. v. Peacock TV, LLC, Case No. 7:23-cv-11037-KMK ("Weiss action")

Dear Judge Karas:

My firm represents the Plaintiffs in the *Shapiro* action referenced above. I write with the consent of the Plaintiffs in the *Weiss* action referenced above and the consent of the Defendant in both actions referenced above. Peacock TV LLC.

Counsel for the Plaintiffs in *Shapiro*, counsel for the Plaintiffs in *Weiss*, and counsel for the Defendant have agreed to consolidate the *Shapiro* and *Weiss* actions into the *Shapiro* action.

The Parties having agreed the consolidation of Weiss, et al. v. Peacock TV, LLC, Case No. 7:23-cv-11037-KMK with Shapiro, et al. v. Peacock TV LLC, Case No. 7:23-cv-06345-KMK pursuant to Rule 42(a)(2) of the Federal Rules of Civil Procedure, the Parties now jointly move for the Court to enter a written order consolidating the Weiss action with the Shapiro action, and directing the Clerk to consolidate the Weiss case number 7:23-cv-11037-KMK into the Shapiro case number 7:23-cv-06345-KMK, and directing that all future pleadings shall bear the case number 7:23-cv-06345-KMK.

Granted. The Parties are to submit a proposed order reflecting the consolidation by 2/6/24.

Respectfully submitted,

/s/ Jeffrey J. Harrington
Jeffrey J. Harrington (pro hac vice)
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CC: All counsel of record in Shapiro (via ECF)

Manuel Hiraldo, Plaintiffs' lead counsel for Plaintiffs Weiss et. al. (via email mhiraldo@hiraldolaw.com)

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